

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

INNOVATIVE GLOBAL SYSTEMS LLC,

Plaintiff,

v.

VOLVO CONSTRUCTION EQUIPMENT  
NORTH AMERICA, INC., et al.,

Defendants.

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CIVIL ACTION NO. 6:10-cv-00327

**JURY TRIAL DEMANDED**

**UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME TO SUBMIT  
DOCKET CONTROL ORDER AND DISCOVERY ORDER**

Pursuant to this Court's Orders of November 4, 2010 (Dkt. 135) and November 17, 2010 (Dkt. 142), the current deadline for the parties to submit their proposed Docket Control Order and proposed Discovery Order is November 29, 2010.

As the parties are involved in ongoing meet and confer discussions in an effort to agree upon a joint submission, Plaintiff hereby files this Unopposed Second Motion for Extension of Time to Submit Proposed Docket Control Order and Discovery Order and respectfully request that the Court extend the deadline up and including Friday, December 3, 2010.

This extension is not sought for delay. Rather, such an extension will allow Plaintiff and Defendants sufficient time to further negotiate. All Defendants are unopposed to this Motion.

**Dated: November 29, 2010**

Respectfully submitted,

/s/ Michael T. Cooke

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**ATTORNEYS FOR PLAINTIFF  
INNOVATIVE GLOBAL SYSTEMS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29<sup>th</sup> day of November, 2010, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Michael T. Cooke

**CERTIFICATE OF CONFERENCE**

I hereby certify that on the 29<sup>th</sup> day of November, 2010, I conferred with Gary Fischman, counsel for Caterpillar, who confirmed that all defendants do not oppose the relief requested.

/s/ Michael T. Cooke